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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

SATA GmbH & Co. KG, a German  
Corporation,

*Plaintiff,*

v.

Taizhou Tool-Bar Machinery Co., Ltd., a  
Chinese company,

*Defendant.*

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Case No. 2:24-cv-02069-CDS-DJA

**UNOPPOSED MOTION TO EXTEND  
DEADLINE FOR DEFENDANT'S  
RESPONSE TO THE COMPLAINT AND  
~~[PROPOSED]~~ ORDER**

**(First Request)**

Plaintiff SATA GmbH & Co. KG ("SATA"), by and through its undersigned counsel, hereby respectfully requests that the Court grant Defendant Taizhou Tool-Bar Machinery Co., Ltd. ("Defendant") an extension of twenty (20) days to respond to the Complaint (ECF No. 1), from November 29, 2024 to December 19, 2024. This is the first request for an extension of this deadline. Defendant has indicated it does not oppose this Motion.

The Complaint in this action was filed on November 5, 2024 (ECF No. 1) and Defendant was served with the Summons and Complaint on November 7, 2024 (ECF No. 5). The current

1 deadline for Defendant to file a responsive pleading is November 29, 2024. Plaintiff's counsel  
 2 was recently contacted by Amber N. Davis of Wolter Van Dyke Davis, PLLC, who indicated she  
 3 had been retained as counsel for Defendant and requested a twenty (20) day extension of time to  
 4 respond to the Complaint. The extension was requested due to the Thanksgiving holiday, to allow  
 5 time to secure local Nevada counsel, and allow time for potential settlement discussions. The  
 6 requested extension is sought in good faith and not for purposes of undue delay.

7 For the foregoing reasons, Plaintiff respectfully requests that the Court grant this Motion.

8 DATED: November 27, 2024

Respectfully submitted,

9 By: /s/ Kevin D. Everage

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18 *Attorneys for Plaintiff*  
 19 *SATA GmbH & Co. KG*

22 **ORDER**

24 IT IS SO ORDERED:

25 

26 UNITED STATES MAGISTRATE JUDGE

27 DATED: 12/3/2024